

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ELIZABETH PAYNE,	§	
Plaintiff	§	
	§	
v.	§	CIVIL ACTION NO. 3-09CV0595-B
	§	
FRIENDSHIP WEST BAPTIST CHURCH, INC.,	§	
Defendant	§	

PLAINTIFF'S WITNESS LIST

A. Probable Witnesses:

1. Elizabeth Davila aka Elizabeth Payne
address
Summary: All aspects of her claim, including her qualifications, disparate treatment, interactions with employees and Rev. Haynes, conduct at job, interaction with others during employment, termination.
Deposed: Yes
Expected duration of direct: one hour

2. Liz Moffett
5201 N. O'Connor Blvd., Suite 500
Irving, Texas 75039
Summary: All aspects of Human Resources, interactions with Plaintiff, knowledge of other relationships of Rev. Haynes, disparate treatment of Plaintiff, policies and procedures, discipline of employees, termination, racial motivations, racially disparate attitudes.
Deposed: Yes
Expected duration of direct: two hours

3. Tonya Neal
5201 N. O'Connor Blvd., Suite 500
Irving, Texas 75039
Summary: Disparate treatment of Plaintiff, racially disparate attitudes, work environment, interactions with Plaintiff, job duties, conduct at work
Deposed: Yes
Expected duration of direct: 45 minutes

4. Veta Holt
5201 N. O'Connor Blvd., Suite 500
Irving, Texas 75039
Summary: Racial attitudes, disparate treatment, discipline, conduct at work, policies and procedures, job duties, termination
Deposed: Yes
Expected duration of direct: 45 minutes
5. Dr. Frederick Haynes
5201 N. O'Connor Blvd., Suite 500
Irving, Texas 75039
Summary: Racial attitudes, racial motivation, disparate treatment, discipline, job duties, policies and procedures, termination, personal relationships.
Deposed: Yes
Expected duration of direct: one and a half hours

B. Possible Witnesses:

1. Danielle Ayers
2020 West Wheatland Road
Dallas, Texas 75232
Summary: Racial attitudes, racial motivation, disparate treatment, job duties, work conduct.
Deposed: No
Expected duration of direct: 30—45 minutes
2. Lora Clack
2020 West Wheatland Road
Dallas, Texas 75232
Summary: Racial attitudes, racial motivation, Rev. Haynes' relationships, work conduct.
Deposed: No
Expected duration of direct: 30 minutes
3. Stephanie Johnson
2020 West Wheatland Road
Dallas, Texas 75232
Summary: Racial attitudes, racial motivation, Rev. Haynes' relationships, work conduct.
Deposed: No
Expected duration of direct
4. Monique Munroe
2020 West Wheatland Road
Dallas, Texas 75232

Summary: Racial attitudes, racial motivation, Rev. Haynes' relationships, work conduct.

Deposed: No
Expected duration of direct:

5. Lisa Harrod
2730 NE 183rd St.
Hialeah, FL 33010
Summary: Relationship with Rev. Haynes
Deposed: No
Expected duration of direct: 20 minutes
6. Maggie Anderson
1163 Clarence Ave
Oak Park, IL 60304
Summary: Relationship with Rev. Haynes
Deposed: No
Expected duration of direct: 20 minutes
7. Rev. Dr. Jeremiah A. Wright Jr
2020 West Wheatland Road
Dallas, Texas 75232
Summary: Relationship with Rev. Haynes, relationship with Plaintiff, Plaintiff's work product
Deposed: No
Expected duration of direct: 45 minutes
8. Rick Hill
2020 West Wheatland Road
Dallas, Texas 75232
Summary: Racial attitudes, racial motivation, Rev. Haynes' relationships, work conduct.
Deposed: No
Expected duration of direct: 30 minutes
9. Jack Akana, Jr.
2020 West Wheatland Road
Dallas, Texas 75232
Summary: Disparate treatment of Plaintiff, racially disparate attitudes, work environment, interactions with Plaintiff, job duties, conduct at work
Deposed: No
Expected duration of direct: 30 minutes
10. Tia Bottom
2020 West Wheatland Road

Dallas, Texas 75232

Summary: Disparate treatment of Plaintiff, racially disparate attitudes, work environment, interactions with Plaintiff, job duties, conduct at work

Deposed: No

Expected duration of direct: 20 minutes

11. Stephanie Washington

2020 West Wheatland Road

Dallas, Texas 75232

Summary: Disparate treatment of Plaintiff, racially disparate attitudes, work environment, interactions with Plaintiff, job duties, conduct at work

Deposed: No

Expected duration of direct: 30 minutes

12. Marcus King

2020 West Wheatland Road

Dallas, Texas 75232

Summary: Disparate treatment of Plaintiff, racially disparate attitudes, work environment, interactions with Plaintiff, job duties, conduct at work

Deposed: No

Expected duration of direct: 30 minutes

C. Experts:

1. Susan E. Hutchison

611 S. Main Street, Suite 700

Grapevine, Texas 76051

Summary: The reasonable and necessary attorney fees incurred by Plaintiff for the prosecution of this case through Judgment and any ensuing appeals.

Deposed: No

Expected duration of direct: expected to be addressed through post verdict motion

2. S. Rafe Foreman

611 S. Main Street, Suite 700

Grapevine, Texas 76051

Summary: The reasonable and necessary attorney fees incurred by Plaintiff for the prosecution of this case through Judgment and any ensuing appeals.

Deposed: No

Expected duration of direct: expected to be addressed through post verdict motion

D. Records Custodians:

None

Respectfully submitted,

s/Susan E. Hutchison

Susan E. Hutchison
Texas Bar No. 10354100
hutch@seeyouincourt.com

S. Rafe Foreman
Texas Bar No. 07255200
warriorforjustice@seeyouincourt.com

Kern Lewis
Texas Bar No. 12295320
lewis@seeyouincourt.com

FOREMAN, LEWIS & HUTCHISON, PC
611 S. Main St., Ste. 700
Grapevine, TX 76051
Tel. 817-336-5533
Fax 817-336-9005

CERTIFICATE OF SERVICE

This is to certify that on this 19th day of May, 2010, a true and correct copy of the above and foregoing document was served on the following attorney of record via ECF filing:

Faith Simmons Johnson
Faith Johnson & Associates, LLP
5201 N. O'Connor Blvd., Ste. 500
Irving, Texas 75039

s/Susan E. Hutchison

Susan E. Hutchison